

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA )**

**Cr. No. 05-189 (JDB)**

**v. )**

**MICHAEL JACKSON )**  

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**UNOPPOSED MOTION TO CONTINUE MOTIONS HEARING SCHEDULED FOR  
SEPTEMBER 1, 2005 AT 9:30 A.M.**

Michael Jackson, through undersigned counsel, respectfully requests this Honorable Court to continue the motions hearing currently scheduled for September 1, 2005. In support of his motion, Mr. Jackson states the following:

Based on police reports filed in the above-captioned case, as well as the government's response to Mr. Jackson's Motion to Suppress, officers from the Metropolitan Police Department first approached Mr. Jackson on the night of March 8<sup>th</sup> following a tip from a Housing Authority Police officer who had allegedly seen both Mr. Jackson and his co-defendant, Monica Mason, through a security camera.

While counsel has received fairly extensive discovery in this case, no audio-visual evidence has been provided thus far. It is counsel's understanding that the images obtained from the security camera were captured on video and that the video is currently being enhanced. Both undersigned counsel and co-defendant's counsel have made numerous requests for the video. It is undersigned counsel's understanding that government counsel is making a good faith effort to obtain the video but has been unsuccessful so far.

Counsel believes that she could more effectively advise and represent Mr. Jackson once

she has had a chance to see the video in question and to review its contents with Mr. Jackson. In light of the fact that the video could provide crucial evidence in his case, Mr. Jackson asks the Court to continue his motions hearing until after the outstanding discovery has been provided.

Counsel has spoken with Manuel Retureta, Esq., counsel for Ms. Mason as well as with Wanda Dixon, Esq., counsel for the government. Neither counsel oppose the instant Motion to Continue.

Respectfully submitted,

A.J. KRAMER  
FEDERAL PUBLIC DEFENDER

\_\_\_\_\_/s/\_\_\_\_\_  
Lara G. Quint  
Assistant Federal Public Defender  
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**CERTIFICATE OF SERVICE**

I, Lara Gabrielle Quint, Assistant Federal Public Defender, hereby certify that a copy of the motion has been electronically served upon Wanda Dixon, Esquire, Assistant United States Attorney and Manuel Retureta, Esq., counsel for Ms. Mason.

\_\_\_\_\_/s/\_\_\_\_\_  
LARA G. QUINT  
Assistant Federal Public Defender

**DATE:** August 29, 2005.